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December 10, 2024

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 20C
New York, NY 10007-1312

Re: *Doe v. Black*, No. 1:23-cv-06418-JGLC – Letter-Motion for Adjournment of Conference

Dear Judge Clarke:

We represent defendant Leon Black in this matter. Pursuant to Your Honor’s Individual Rule 2(e), we respectfully request an adjournment of the conference regarding the parties’ discovery dispute concerning Mr. Black’s request to quash or modify deposition subpoenas Plaintiff intends to serve on three of Mr. Black’s attorneys and Mr. Black’s wife, which is currently scheduled for December 12, 2024, at 11:00 a.m.

We request the adjournment for two reasons. First, as stated in the joint letter (ECF No. 166), Plaintiff proposed a compromise position of having the parties “brief the issues.” *Id.* at 3. Defendant is willing to accept that compromise, which would eliminate the need for the conference.

Second, undersigned counsel, who intends to argue at the conference on behalf of Mr. Black, had a scheduling conflict arise, which has made attending the conference difficult.¹ Accordingly, we respectfully request that the Court permit the parties to proceed with Plaintiff’s proposed compromise position and brief a motion to quash the subpoenas.

As required by Individual Rule 2(e), we further state that:

- 1) The conference on the parties’ discovery dispute concerning deposition subpoenas issued to Mr. Black’s attorneys and wife is currently scheduled for Thursday, December 12, 2024, and the Mr. Black requests that the Court adjourn the conference and that the Court accept Plaintiff’s compromise position and permit the parties to brief Defendant’s proposed motion to quash;

¹ To the extent this letter is submitted after the 48-hour requirement set forth in Individual Rule 2(e), we apologize for the delay, which was due to counsel’s efforts to resolve the scheduling conflict and to seek opposing counsel’s position on the issue, and respectfully request that the Court allow the request *nunc pro tunc*.

The Hon. Jessica G. L. Clarke
December 10, 2024

- 2) There have been no previous requests for adjournment or extension of this conference;
- 3) The proposed adjournment is necessary to resolve a scheduling conflict and because the request to brief the motion eliminates the need for a conference;
- 4) Plaintiff's position: "Plaintiff notes that Ms. Perry was not part of the meet and confer regarding the pre-motion letter, but with the understanding that this Court expects counsel to cooperate, we have no objection and will brief the issues in lieu of a conference if the Court so directs"; and
- 5) The parties are scheduled to appear before the Court for a case management conference on May 1, 2025.

Accordingly, we respectfully request that the discovery conference currently scheduled for December 12, 2024, be adjourned and that the parties be permitted to brief Defendant's proposed motion to quash.

Respectfully submitted,

/s/ E. Danya Perry

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